

**U.S. District Court**  
**Eastern District of Virginia - (Newport News)**  
**CRIMINAL DOCKET FOR CASE #: 4:16-cr-00049-RAJ-**  
**RJK-3**

Case title: USA v. Fadeyibi et al

Date Filed: 05/11/2016

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Assigned to: District Judge

Raymond A. Jackson

Referred to: Magistrate Judge

Robert J. Krask

**Defendant (3)**

**Habeeb Odoffin**

<b><u>Pending Counts</u></b>	<b><u>Disposition</u></b>
T. 18, USC 1349, 1344, 1342, and 1343 - Conspiracy to Commit Mail Fraud, Bank Fraud, and Wire Fraud\T. 18, USC 981(a)(1)(C) and 982(a) (2)(A); and T. 28, USC 2461 (c) - Criminal Forfeiture (1)	
T. 18, USC 1341 and 2 - Mail Fraud (5-6)	
T. 18, USC 1341 and 2 - Mail Fraud (11-12)	

T. 18, USC 1344 and 2 -  
Bank Fraud  
(17-18)

T. 18, USC 1344 and 2 -  
BANK FRAUD  
(22-23)

T. 18, USC 1343 and 2 - Wire  
Fraud  
(27-28)

T. 18, USC 1343 and 2 - Wire  
Fraud  
(31-32)

T. 18, USC 1028A(a)(1) and  
(c) and 2 - Aggravated  
Identity Theft  
(36-37)

T. 18, USC 1028A(a)(1) and  
(c) and 2 - Aggravated  
Identity Theft  
(41-42)

**Highest Offense Level**  
**(Opening)**

Felony

**Terminated Counts**      **Disposition**

None

**Highest Offense Level**  
**(Terminated)**

None

**Complaints**      **Disposition**

None

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**Plaintiff**

**USA**

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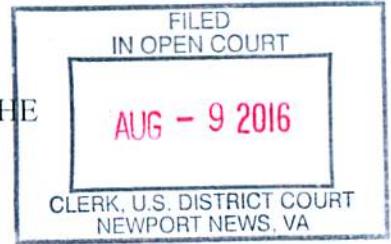
Date Filed	#	Docket Text
08/09/2016	<a href="#">7</a>	

		MOTION to Seal Superseding Indictment filed in open court 8/9/16 by USA as to Babajide Fadeyibi, Toheeb Odoffin, Habeeb Odoffin, Hafeez Odoffin, Zoelithia Williams, Timeiki Hedspeth, Christie Easter, Oyeyemi Arogundade. (ecav, ) (Entered: 08/10/2016)
08/09/2016	<a href="#">8</a>	ORDER SEALING SUPERSEDING INDICTMENT filed in open court 8/9/16, as to Babajide Fadeyibi, Toheeb Odoffin, Habeeb Odoffin, Hafeez Odoffin, Zoelithia Williams, Timeiki Hedspeth, Christie Easter, Oyeyemi Arogundade. It is hereby ORDERED that the superseding indictment and arrest warrants are sealed, as outlined. It is further ORDERED that the superseding indictment and arrest warrants are unsealed at the initial appearance of any of the defendants, at which time the superseding indictment may be treated as a public record. (Signed by Magistrate Judge Douglas E. Miller on 8/9/16). (ecav, ) (Entered: 08/10/2016)
08/09/2016	<a href="#">9</a>	SEALED SUPERSEDING CRIMINAL INDICTMENT FILED IN OPEN COURT 8/9/16, as to Babajide Fadeyibi (1) count(s) 1s, 2s-14s, 15s-21s, 22s-24s, 25s-33s, 34s-43s, Toheeb Odoffin (2) count(s) 1, 5-6, 17-18, 27-28, 36-37, Habeeb Odoffin (3) count(s) 1, 5-6, 11-12, 17-18, 22-23, 27-28, 31-32, 36-37, 41-42, Hafeez Odoffin (4) count(s) 1, 11-13, 22-23, 31-32, 41-42, Zoelithia Williams (5) count(s) 1, 2-3, 7, 15, 19, 21, 24, 25, 29, 34, 38, Timeiki Hedspeth (6) count(s) 1, 4, 14, 16, 24, 26, 33, 35, 43, Christie Easter (7) count(s) 1, 8-10, 20-21, 30, 39-40, Oyeyemi Arogundade (8) count(s) 1, 21, 22-24. On motion of the Government the Court DIRECTED: Warrants to be issued. (Attachments: # <a href="#">1</a> Deft Info. Sheet) (ecav, ) (Entered: 08/10/2016)
08/09/2016	<a href="#">21</a>	Arrest Warrant Issued on Superseding Indictment and delivered to USM 8/10/16 as directed by Magistrate Judge Douglas E. Miller, as to Habeeb Odoffin. (ecav, ) (Entered: 08/10/2016)

08/16/2016	Case as to Babajide Fadeyibi, Toheeb Odoffin, Habeeb Odoffin, Hafeez Odoffin, Zoelithia Williams, Timeiki Hedspeth, Christie Easter, Oyeyemi Arogundade Reassigned to District Judge Raymond A. Jackson. District Judge Robert G. Doumar no longer assigned to the case. (afar) (Entered: 08/16/2016)
10/17/2016	Case unsealed as to Babajide Fadeyibi, Toheeb Odoffin, Habeeb Odoffin, Hafeez Odoffin, Zoelithia Williams, Timeiki Hedspeth, Christie Easter, Oyeyemi Arogundade. (ecav, ) (Entered: 10/17/2016)

<b>PACER Service Center</b>			
<b>Transaction Receipt</b>			
10/17/2016 13:55:23			
<b>PACER Login:</b>	us3753:2653133:0	<b>Client Code:</b>	
<b>Description:</b>	Docket Report	<b>Search Criteria:</b>	4:16-cr-00049-RAJ-RJK
<b>Billable Pages:</b>	2	<b>Cost:</b>	0.20

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Newport News Division



UNITED STATES OF AMERICA	) CRIMINAL NO. 4:16cr49
v.	) <b><u>FILED UNDER SEAL</u></b>
BABAJIDE FADEYIBI, a/k/a "Dennis Beckett" a/k/a "Dennis Burton" a/k/a "Dennis Grover" a/k/a "Dennis Hawkins" a/k/a "Dennis Hunt" a/k/a "Dennis Kress" a/k/a "Dennis Matheny" a/k/a "Dennis Taplin" a/k/a "Scott Miller" (Counts 1-43)	) 18 U.S.C. § 1349 Conspiracy to Commit Mail Fraud, Bank Fraud, and Wire Fraud (Count 1) 18 U.S.C. §§ 1341 and 2 Mail Fraud (Count 2-14) 18 U.S.C. §§ 1344 and 2 Bank Fraud (Counts 15-24)
TOHEEB ODOFFIN, (Counts 1, 5, 6, 17, 18, 27, 28, 36, 37)	) 18 U.S.C. §§ 1343 and 2 Wire Fraud (Counts 25-33)
HABEEB ODOFFIN, (Counts 1, 5, 6, 11, 12, 17, 18, 22, 23, 27, 28, 31, 32, 36, 37, 41, 42)	) 18 U.S.C. §§ 1028A and 2 Aggravated Identity Theft (Counts 34-43)
HAFEEZ ODOFFIN, (Counts 1, 11, 12, 13, 22, 23, 31, 32, 41, 42)	) 18 U.S.C. §§ 981, 982 Criminal Forfeiture
ZOELITHIA WILLIAMS, (Counts 1, 2, 3, 7, 15, 19, 21, 24, 25, 29, 34, 38)	)
TIMEIKI HEDSPETH, (Counts 1, 4, 14, 16, 24, 26, 33, 35, 43)	)
CHRISTIE EASTER, (Counts 1, 8, 9, 10, 20, 21, 30, 39, 40)	)
OYEYEMI AROGUNDADE, (Counts 1, 21, 22, 23, 24)	)
Defendants.	)

SUPERSEDING INDICTMENT

August 2016 Term - At Newport News, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. Beginning on a date unknown to the Grand Jury, but believed to be in or about late 2011, and continuing until in or about at least fall 2015, the exact dates being unknown to the Grand Jury, in the Eastern District of Virginia and elsewhere, BABAJIDE FADEYIBI, a/k/a "Dennis Beckett," a/k/a "Dennis Burton," a/k/a "Dennis Grover," a/k/a "Dennis Hawkins," a/k/a a/k/a "Dennis Hunt," a/k/a "Dennis Kress," a/k/a "Dennis Matheny," a/k/a "Dennis Taplin," a/k/a "Scott Miller," TOHEEB ODOFFIN, HABEEB ODOFFIN, HAFEEZ ODOFFIN, ZOELITHIA WILLIAMS, TIMEIKI HEDSPETH, CHRISTIE EASTER, and OYEYEMI AROGUNDADE, the defendants herein, and others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, and agree with each other and others known and unknown to the Grand Jury, to commit the following offenses against the United States:

a. To knowingly devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, for which the defendant and co-conspirators knowingly caused to be placed in a post office, in an authorized depository for mail matter to be sent and delivered by the Postal Service, or caused to be deposited a matter or thing to be sent or delivered by private or commercial interstate carrier according to the directions thereon certain matters and things, for the purpose of executing the scheme and artifice to defraud, in violation of Title 18, United States Code, Section 1341;

b. To knowingly and willfully execute and attempt to execute a scheme and artifice to defraud and to obtain the moneys, funds, credits, assets, securities owned by and under the custody and control of financial institutions, as defined under Title 18, United States Code, Section 20, by means of materially false and fraudulent pretenses, representations and promises, in violation of Title 18, United States Code, Section 1344; and

c. To knowingly devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, for which the defendants and conspirators transmitted and caused to be transmitted by means of wire communications in interstate commerce certain writings, signs, signals and sounds, for the purpose of executing the scheme and artifice, in violation of Title 18, United States Code, Section 1343.

#### WAYS, MANNER AND MEANS OF THE CONSPIRACY

The ways, manner and means by which the foregoing objectives of the conspiracy to commit mail, bank, and wire fraud were to be accomplished included, but were not limited to, the following:

2. The primary purpose of the conspiracy was for the conspirators to obtain funds through fraudulent means by recruiting individuals to use their own bank accounts to negotiate counterfeit financial instruments, consisting mainly of counterfeit cashier's checks and counterfeit Postal money orders, and further sending the funds by money transmission service for the conspirators' own use and benefit.

3. It was a part of the conspiracy and the scheme and artifice that the conspirators recruited individuals throughout the United States via email to serve as "Mystery Shoppers," in which the individuals would receive financial instruments and then use such instruments to

evaluate the services of certain money transmission services, including Western Union and Money Gram. The recruited individuals were advised that this practice was a legitimate employment opportunity.

4. It was further a part of the conspiracy and the scheme and artifice that the conspirators would obtain legitimate cashier's checks and legitimate Postal money orders and provide them to other conspirators.

5. It was further a part of the conspiracy and the scheme and artifice that the conspirators would use the legitimate financial instruments to make counterfeit versions of the instruments.

6. It was further a part of the conspiracy and the scheme and artifice that once a recruited individual, or "Mystery Shopper," responded to the email solicitation with interest, the conspirators would obtain personal identification information from the Mystery Shopper, which was then placed on the counterfeit cashier's check or Postal money order.

7. It was further a part of the conspiracy and the scheme and artifice that the conspirators caused mailings to be sent via the United States mails and private interstate commercial carriers to the Mystery Shoppers that contained the counterfeit cashier's check or Postal money order.

8. It was further a part of the conspiracy and the scheme and artifice that the conspirators instructed the Mystery Shoppers to negotiate the counterfeit checks or money orders at their own bank, keeping a portion of the represented payment for their services, but withdrawing the majority of the funds represented on the counterfeit check or money order.

9. It was further a part of the conspiracy and the scheme and artifice that the Mystery Shoppers did present the counterfeit checks and money orders to banks, which were

financial institutions as defined by 18 U.S.C. § 20, using the Mystery Shopper's own bank account.

10. It was further a part of the conspiracy and the scheme and artifice that the Mystery Shoppers, as directed by conspirators, transmitted by Western Union or Money Gram a large portion of the obtain funds to locations throughout the United States through the use of wirings in interstate commerce.

11. It was further a part of the conspiracy and the scheme and artifice that conspirators and/or other recruited individuals retrieved the transmitted funds, which were proceeds of the fraud, and engaged in further distribution of these fraud proceeds.

12. It was further a part of the conspiracy and the scheme and artifice that Mystery Shoppers and various financial institutions suffered losses when the negotiated checks and money orders were determined to be counterfeit.

(In violation of Title 18, United States Code, Sections 1349, 1344, 1341, and 1343.)

COUNTS TWO THROUGH FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 2 through 12 of the Ways, Manner and Means Section of Count One as if fully set forth herein.
2. On or about the dates set forth below, within the Eastern District of Virginia and elsewhere, BABAJIDE FADEYIBI, a/k/a "Dennis Beckett," a/k/a "Dennis Burton," a/k/a "Dennis Grover," a/k/a "Dennis Hawkins," a/k/a a/k/a "Dennis Hunt," a/k/a "Dennis Kress," a/k/a "Dennis Matheny," a/k/a "Dennis Taplin," a/k/a "Scott Miller," TOHEEB ODOFFIN, HABEEB ODOFFIN, HAFEEZ ODOFFIN, ZOELITHIA WILLIAMS, TIMEIKI HEDSPETH, and CHRISTIE EASTER, the defendants herein, and others known and unknown to the Grand Jury, having devised and intended to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false, fraudulent and fictitious pretenses, representations, and promises, and, for the purpose of executing the aforesaid scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises the defendants and others, did knowingly cause to be placed in a post office, in an authorized depository for mail matter to be sent and delivered by the Postal Service or caused to be deposited a matter or thing to be sent or delivered by private or commercial interstate carrier according to the directions thereon the following matters and things:

Count	Defendant(s)	Date Placed in Mail (on or about)	Description of Item(s) Mailed	From	To
2	FADEYIBI, WILLIAMS	August 15, 2012	Counterfeit Postal Money Order sent by mailing	Nashville, Tennessee	Victim T.L. in Portsmouth, Virginia

3	FADEYIBI, WILLIAMS	August 28, 2012	3 Counterfeit Postal Money Orders sent via Federal Express	Nashville, Tennessee	Victim T.L. in Portsmouth, Virginia
4	FADEYIBI, HEDSPETH	December 9, 2012	Counterfeit Postal Money Order sent via United States Postal Service	Houston, Texas	Victim L.C. in Virginia Beach, Virginia
5	FADEYIBI, TOHEEB ODOFFIN HABEEB ODOFFIN	December 29, 2012	Counterfeit Colonial Life check sent via United States Postal Service	Phoenix, Arizona	Victim M.O. in Virginia Beach, Virginia
6	FADEYIBI, TOHEEB ODOFFIN HABEEB ODOFFIN	December 31, 2012	Counterfeit Colonial Life check sent via United States Postal Service	Gainesville, FL	Victim M.L. in Hampton, Virginia
7	FADEYIBI, WILLIAMS	January 5, 2013	Counterfeit Postal Money Order sent via United States Postal Service	Nashville, Tennessee	Victim F.V. in Chesapeake, Virginia
8	FADEYIBI, EASTER	February 22, 2013	Counterfeit Postal Money Order sent via United States Postal Service	Fort Worth, Texas	Victim S.A. in Newport News, Virginia
9	FADEYIBI, EASTER	February 25, 2013	3 Counterfeit postal money order sent via Federal Express	Fort Worth, Texas	Victim S.A. in Newport News, Virginia
10	FADEYIBI, EASTER	March 14, 2013	Counterfeit SunTrust cashier's check via United States Postal Service	Fort Worth, Texas	Victim M.P. in Manassas, Virginia
11	FADEYIBI, HABEEB ODOFFIN, HAFEEZ ODOFFIN	April 23, 2013	Counterfeit SunTrust cashier's check via United States Postal Service	Edmonds, Washington	Victim D.W. in Portsmouth, Virginia

12	FADEYIBI, HABEEB ODOFFIN, HAFEEZ ODOFFIN	June 6, 2013	Counterfeit Community Resource Credit Union cashier's check sent via <i>sent via mailing</i> Federal Express	Unknown location	Victim Z.L. in Newport News, Virginia
13	FADEYIBI, HAFEEZ ODOFFIN	July 2, 2013	Counterfeit Community Resource Credit Union check sent via United States Postal Service	Yuma, Arizona	Victim J.M. in Newport News, Virginia
14	FADEYIBI, HEDSPETH	May 28, 2014	Counterfeit First Tennessee Bank cashier's check sent via United States Postal Service	Houston, Texas	Victim G.R. in Newport News, Virginia

(In violation of Title 18, United States Code, Sections 1341 and 2.)

COUNTS FIFTEEN THROUGH TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 2 through 12 of the Ways, Manner and Means Section of Count One as if fully set forth herein.
2. On or about the dates and in the manner set forth herein, in the Eastern District of Virginia and elsewhere, BABAJIDE FADEYIBI, a/k/a "Dennis Beckett," a/k/a "Dennis Burton," a/k/a "Dennis Grover," a/k/a "Dennis Hawkins," a/k/a a/k/a "Dennis Hunt," a/k/a "Dennis Kress," a/k/a "Dennis Matheny," a/k/a "Dennis Taplin," a/k/a "Scott Miller," TOHEEB ODOFFIN, HABEEB ODOFFIN, HAFEEZ ODOFFIN, ZOELITHIA WILLIAMS, TIMEIKI HEDSPETH, CHRISTIE EASTER, and OYEYEMI AROGUNDADE, the defendants herein, aided and abetted by others and along with others known and unknown to the Grand Jury, knowingly and willfully executed and attempted to execute a scheme and artifice to defraud and to obtain the moneys, funds, credits, assets, securities owned by and under the custody and control of financial institutions, as defined under Title 18, United States Code, Section 20, by means of materially false and fraudulent pretenses, representations and promises, as further described below:

Count	Defendants	Date of Transaction (on or about)	Description / Purpose of Transaction
15	FADEYIBI, WILLIAMS	August 22, 2012	Victim T.L. negotiated a counterfeit Postal Money Order in the amount of \$975.00 at Navy Federal Credit Union located in Portsmouth, Virginia, through an account ending in 4894.
16	FADEYIBI, HEDSPETH	December 14, 2012	Victim L.C. negotiated a counterfeit Postal Money Order in the amount of \$870 at Wachovia in Virginia Beach, VA through an account ending in 2697.

17	FADEYIBI, TOHEEB ODOFFIN HABEEB ODOFFIN	January 3, 2013	Victim M.O. negotiated a counterfeit Colonial Life cashier's check for \$1850 into Navy Federal Credit Union located in Virginia Beach, Virginia through an account ending in 4534.
18	FADEYIBI, TOHEEB ODOFFIN HABEEB ODOFFIN	January 7, 2013	Victim M.L. negotiated a counterfeit Colonial Life cashier's check in the amount of \$1850 at Old Point National Bank account located in Hampton, Virginia, through an account ending in 2306.
19	FADEYIBI, WILLIAMS	January 8, 2013	Victim F.V. negotiated a counterfeit Postal Money Order in the amount of \$870 into his Navy Federal Credit Union checking account ending in 0454.
20	FADEYIBI, EASTER	February 25, 2013	Victim S.A. negotiated a counterfeit Postal Money Order in the amount of \$870 at Bayport Federal Credit Union, located in Newport News, Virginia, through an account ending in 9075.
21	FADEYIBI, WILLIAMS, EASTER, AROGUNDADE,	<del>March 15, 2013</del> <i>April 11, 2013</i>	Victim M.P. negotiated a counterfeit SunTrust cashier's check at Fauquier Bank located in Warrenton, Virginia through an account ending in 8107.
22	FADEYIBI, HABEEB ODOFFIN, HAFEEZ ODOFFIN, AROGUNDADE	June 18, 2013	Victim Z.L. negotiated a counterfeit Community Resource Credit Union cashier's check in the amount of \$1,680.00 at Navy Federal Credit Union located in Newport News, Virginia, through an account ending in 9705.
23	FADEYIBI, HABEEB ODOFFIN, HAFEEZ ODOFFIN, AROGUNDADE	June 19, 2013	Victim Z.L. negotiated a counterfeit Community Resource Credit Union cashier's check in the amount of \$1,680.00 at Navy Federal Credit Union located in Newport News, Virginia, through an account ending in 9705.
24	FADEYIBI, WILLIAMS, HEDSPETH, AROGUNDADE	June 6, 2014	Victim G.R. negotiated a counterfeit First Tennessee Bank cashier's check in the amount of \$1,680.00 at Wells Fargo located in Newport News, Virginia, through an account ending in 0993.

(In violation of Title 18, United States Code, Sections 1344 and 2.)

COUNTS TWENTY-FIVE THROUGH THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 2 through 12 of the Ways, Manner and Means Section of Count One as if fully set forth herein.
2. On or about the dates and in connection with the transactions described below, in the Eastern District of Virginia and elsewhere, BABAJIDE FADEYIBI, a/k/a "Dennis Beckett," a/k/a "Dennis Burton," a/k/a "Dennis Grover," a/k/a "Dennis Hawkins," a/k/a a/k/a "Dennis Hunt," a/k/a "Dennis Kress," a/k/a "Dennis Matheny," a/k/a "Dennis Taplin," a/k/a "Scott Miller," TOHEEB ODOFFIN, HABEEB ODOFFIN, HAFEEZ ODOFFIN, ZOELITHIA WILLIAMS, TIMEIKI HEDSPETH, and CHRISTIE EASTER, the defendants herein, aided and abetted by others and along with others known and unknown to the Grand Jury, having devised and intended to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false, fraudulent and fictitious pretenses, representations and promises, and, for the purpose of executing the aforesaid scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, in the Eastern District of Virginia and elsewhere, did knowingly and willfully transmit and cause to be transmitted by means of wire communication in interstate commerce, the following certain signs, signals, and sounds: to wit, the following email communications sent from, through or to locations within the Eastern District of Virginia, to, through or from locations outside the Commonwealth of Virginia.

Count	Defendant(s)	Date of Wire Transmission (on or about)	Description of Wire Transmission
25	FADEYIBI, WILLIAMS	August 28, 2012	T.L. wired funds in the amount of \$785 via Western Union from Portsmouth, Virginia to M.T. in Atlanta, Georgia.
26	FADEYIBI, HEDSPETH	December 14, 2012	Victim L.C. wired funds in the amount of \$740 via Western Union from Virginia Beach, Virginia to L.W. in Manila, Philippines
27	FADEYIBI, TOHEEB ODOFFIN, HABEEB ODOFFIN	January 3, 2013	Victim M.O. wired funds in the amount of \$1450 via Western Union from Norfolk, Virginia to J.K. in Riverdale, Georgia.
28	FADEYIBI, TOHEEB ODOFFIN, HABEEB ODOFFIN	January 8, 2013	Victim M.L. wired funds in the amount of \$1,450 via Western Union from Tabb, Virginia, to J.K. in Atlanta, Georgia
29	FADEYIBI, WILLIAMS	January 8, 2013	Victim F.V. wired funds in the amount of \$740 via Western Union from Portsmouth, Virginia to D.C. in Manila, Philippines
30	FADEYIBI, EASTER	February 25, 2013	S.A. wired funds in the amount of \$690 via Western Union from Newport News, Virginia, to M.Y. in Jonesboro, Georgia.
31	FADEYIBI, HABEEB ODOFFIN, HAFEEZ ODOFFIN	June 18, 2013	Victim Z.L. wired funds in the amount of \$1,330 via Western Union from Newport News, Virginia to M.D. in Chicago, Illinois
32	FADEYIBI, HABEEB ODOFFIN, HAFEEZ ODOFFIN	June 19, 2013	Victim Z.L. wired funds in the amount of \$1330 via Western Union from Newport News, Virginia to M.D. in Chicago, Illinois
33	FADEYIBI, HEDSPETH	June 6, 2014	Victim G.R. wired funds in the amount of \$1350 via Money Gram from Newport News, Virginia to T.M. in Los Angeles, California.

(In violation of Title 18, United States Code, Sections 1343 and 2.)

COUNTS THIRTY-FOUR THROUGH FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury re-alleges and incorporates by reference the allegations contained in Paragraphs 2 through 12 of the Ways, Manner and Means Section of Count One as if fully set forth herein.

2. On or about the dates and in the manner set forth below, in the Eastern District of Virginia and elsewhere BABAJIDE FADEYIBI, a/k/a "Dennis Beckett," a/k/a "Dennis Burton," a/k/a "Dennis Grover," a/k/a "Dennis Hawkins," a/k/a a/k/a "Dennis Hunt," a/k/a "Dennis Kress," a/k/a "Dennis Matheny," a/k/a "Dennis Taplin," a/k/a "Scott Miller," TOHEEB ODOFFIN, HABEEB ODOFFIN, HAFEEZ ODOFFIN, ZOELITHIA WILLIAMS, TIMEIKI HEDSPETH, and CHRISTIE EASTER, the defendants herein, aided and abetted by others and along with others known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally transfer, possess and use, without lawful authority, a means of identification of another during and in relation to felony violations of provisions contained in chapter 63 of Title 18 of the United States Code, to wit: Conspiracy to Commit Mail Fraud, Bank Fraud, and Wire Fraud, in violation of Title 18, United States Code, Section 1349, Mail Fraud, in violation of Title 18, United States Code, Section 1341, and Bank Fraud, in violation of Title 18, United States Code, Section 1344, as follows:

Count	Defendants	Date (on or about)	Description/Purpose of Transaction/Means of Identifications	Felony Violation(s)
34	FADEYIBI, WILLIAMS	August 22, 2012	Victim T.L. deposited a counterfeit Postal Money Order in the amount of \$975.00 at Navy Federal Credit Union located in Portsmouth, Virginia, into an account ending in 4894 associated with T.L.	18 U.S.C. §§ 1349, 1344

35	FADEYIBI, HEDSPETH	December 14, 2012	Victim L.C. cashed a counterfeit Postal Money Order in the amount of \$870 at Wachovia Bank located in Virginia Beach, Virginia, into account ending in 2697 associated with L.C.	18 U.S.C. §§ 1349, 1344
36	FADEYIBI, TOHEEB ODOFFIN, HABEEB ODOFFIN	January 3, 2013	Victim M.O. received and negotiated a counterfeit Colonial Life cashier's check made out to M.O. containing M.O.'s address for \$1850 into NFCU located in Virginia Beach, Virginia through an account ending in 4534.	18 U.S.C. §§ 1349, 1341, 1344
37	FADEYIBI, TOHEEB ODOFFIN, HABEEB ODOFFIN	January 7, 2013	Victim M.L. negotiated a counterfeit Colonial Life check in the amount of \$1850.00 at Old Point National Bank located in Hampton, Virginia, through an account ending in 2306.	18 U.S.C. §§ 1349, 1344
38	FADEYIBI, WILLIAMS	January 8, 2013	Victim F.V. cashed a counterfeit Postal Money Order in the amount of \$870 at Navy Federal Credit Union located in Portsmouth, Virginia, into account ending in 0454 associated with F.V.	18 U.S.C. §§ 1349, 1344
39	FADEYIBI, EASTER	February 25, 2013	Victim S.A. deposited a counterfeit Postal Money Order in the amount of \$870.00 at Bayport Federal Credit Union, located in Newport News, Virginia, into account ending in 9075 associated with S.A.	18 U.S.C. §§ 1349, 1344
40	FADEYIBI, EASTER	March 15, 2013 April 11, 2013	Victim M.P. negotiated a counterfeit SunTrust cashier's check at Fauquier Bank located in Warrenton, Virginia through an account ending in 8107.	18 U.S.C. §§ 1349, 1344
41	FADEYIBI, HABEEB ODOFFIN HAFEEZ ODOFFIN	June 18, 2013	Victim Z.L. negotiated a counterfeit Community Resource Credit Union cashier's check in the amount of \$1,680.00 at Navy Federal Credit Union located in Newport News, Virginia, through an account ending in 9705.	18 U.S.C. §§ 1349, 1344
42	FADEYIBI, HABEEB ODOFFIN HAFEEZ ODOFFIN	June 19, 2013	Victim Z.L. negotiated a counterfeit Community Resource Credit Union cashier's check in the amount of \$1,680.00 at Navy Federal Credit Union located in Newport News, Virginia, through an account ending in 9705.	18 U.S.C. §§ 1349, 1344

43	FADEYIBI, HEDSPETH	June 6, 2014	Victim G.R. cashed a counterfeit First Tennessee Bank cashier's check in the amount of \$1,680.00 at Wells Fargo located in Newport News, Virginia, into account ending in 0993 associated with G.R.	18 U.S.C. §§ 1349, 1344
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(In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c) and 2.)

CRIMINAL FORFEITURE

THE GRAND JURY FURTHER ALLEGES AND FINDS PROBABLE CAUSE THAT:

1. The defendants, if convicted of any of the violations alleged in Counts One through Forty-Three of this Superseding Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.
2. If any property that is subject to forfeiture above, as a result of any act or omission of the defendants, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendants, as subject to forfeiture under Title 21, United States Code, Section 853(p).
3. The property subject to forfeiture includes, but is not limited to, the following property:
  - a. A monetary judgment in the amount of not less than \$3,788,168.00, representing the proceeds of Counts One through Forty-Three.

(In accordance with Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A); and Title 28, United States Code, Section 2461(c)).

REDACTED COPY

UNITED STATES v. BABAJIDE FADEYIBI et al., 4:16cr 49

A TRUE BILL:

REDACTED COPY

FOR PERSON

DANA J. BOENTE  
UNITED STATES ATTORNEY

By:



Brian J. Samuels  
Assistant United States Attorney  
Virginia State Bar No. 65898  
Fountain Plaza Three, Suite 300  
721 Lakefront Commons  
Newport News, Virginia 23606  
Tel. (757) 591-4000  
Fax: (757) 591-0866

By:



Megan M. Cowles  
Assistant United States Attorney  
Fountain Plaza Three, Suite 300  
721 Lakefront Commons  
Newport News, Virginia 23606  
Tel. (757) 591-4000  
Fax: (757) 591-0866

JS 45 (11/2002)

**Criminal Case Cover Sheet****U.S. District Court**

<b>Place of Offense:</b>		<b>Under Seal: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b>	<b>Judge Assigned: DOUMAR</b>
City: <u>EDVA</u>	Superseding Indictment: YES		Criminal Number: <u>4:16CR49</u>
County/Parish:	Same Defendant:		New Defendant: YES
	Magistrate Judge Case Number:		<b>Arraignment Date:</b>
	Search Warrant Case Number:		
	R 20/R 40 from District of _____.		

**Defendant Information:**

Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	FBI#:				
Defendant Name: <u>HABEEB ODOFFIN</u>		Alias Name(s):			
Address: Riverdale, GA 30274					
Employment:					
Birth Date: <u>1979</u>	SS#: <u>1291</u>	Sex: <u>M</u>	Race: <u>Black</u>	Nationality: <u>Nigerian</u>	Place of Birth: <u>Nigeria</u>
Height:	Weight: <u>lbs</u>	Hair:	Eyes:	Scars/Tattoos:	
Interpreter: Yes <input type="checkbox"/> No <input type="checkbox"/>	List Language and/or dialect:				

**Location Status:**

Arrest Date:				
<input type="checkbox"/> Already in Federal Custody as of: _____ in: _____.				
<input type="checkbox"/> Already in State Custody		<input type="checkbox"/> On Pretrial Release	<input type="checkbox"/> Not in Custody	
<input checked="" type="checkbox"/> Arrest Warrant Requested		<input type="checkbox"/> Fugitive	<input type="checkbox"/> Summons Requested	
<input type="checkbox"/> Arrest Warrant Pending		<input checked="" type="checkbox"/> Detention Sought	<input type="checkbox"/> Bond	

**Defense Counsel Information:**

Name:	<input type="checkbox"/> Court Appointed		
Address:	<input type="checkbox"/> Retained		
Telephone:	<input type="checkbox"/> Public Defender		
	<input type="checkbox"/> Office of Federal Public Defender should not be appointed due to conflict of interest		
	<input type="checkbox"/> CJA attorney: _____ should not be appointed due to conflict of interest		

**U.S. Attorney Information:**

AUSA Brian Samuels & Megan Cowles	Telephone No. <u>757-591-4031</u>	Bar #: <u>65898</u>
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**Complainant Agency, Address & Phone Number or Person & Title:**

FBI, SA AMY DOUGHERTY, (757) 609-2643
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**U.S.C. Citations:**

	Code/Section	Description of Offense Charged	Count(s)	Capital/Felony/Misd/Petty
Set 1	<u>18 U.S.C. § 1349</u>	Conspiracy to Commit Mail Fraud, Bank Fraud, and Wire Fraud	1	Felony
Set 2	<u>18 U.S.C. §§ 1341 and 2</u>	Mail Fraud	5-6, 11-12	Felony
Set 3	<u>18 U.S.C. §§ 1344 and 2</u>	Bank Fraud	17-18, 22-23	Felony
Set 4	<u>18 U.S.C. §§ 1343 and 2</u>	Wire Fraud	27-28, 31-32	Felony
Set 5	<u>18 U.S.C. §§ 1028A and 2</u>	Aggravated Identity Theft	36-37, 41-42	Felony
Set 6	<u>18 U.S.C. §§ 981, 982</u>	Criminal Forfeiture		

0139596

ORIGINAL

FBI

## UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

2016 AG 17 **SEALED**

United States of America )  
 v. )  
 )  
 HABEEB ODOFFIN ) Case No. 4:16cr00049-003 SEALED  
 )  
 Defendant )

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
 (name of person to be arrested) HABEEB ODOFFIN,  
 who is accused of an offense or violation based on the following document filed with the court:

Indictment  Superseding Indictment  Information  Superseding Information  Complaint  
 Probation Violation Petition  Supervised Release Violation Petition  Violation Notice  Order of the Court

This offense is briefly described as follows:

Count 1, et al: T. 18, USC 1349 - Conspiracy to Commit Mail Fraud, Bank Fraud, and Wire Fraud

Date: 08/09/2016

 Issuing officer's signature
City and state: Newport News, Virginia

Douglas E. Miller, U.S. Magistrate Judge

Printed name and title

Return  
 This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
 at (city and state) \_\_\_\_\_

**RECEIVED**  
**COPY ONLY**

Date: \_\_\_\_\_

**NOTICE: BEFORE ARREST, VALIDATE**  
**Arresting officer's signature**  
**THROUGH NCIC. ORIGINAL**  
**HELD BY U.S. MARSHAL.**  
 Printed name and title